

FILED

UNITED STATES DISTRICT COURT  
for the Western District of Texas

2015 OCT 22 PM 2:18

GENERAL DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

DEUSCHE BANK NATIONAL ]  
TRUST COMPANY, AS TRUSTEE ]  
FOR NEW CENTURY HOME EQUITY ]  
LOAN TRUST, SERIES 2005-C ASSET ]  
Plaintiff ] CIVIL ACTION NO. 1:15-CV-823  
]  
v. ]  
] Cynthia Watson and Richard Watson ]  
Defendants ]

BY \_\_\_\_\_ OS  
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**DEFENDANTS ORIGINAL ANSWER**

Richard Watson and Cynthia Watson, hereby enter their Original Answer to the Complaint of the Plaintiff, and would show the Court as follows:

Plaintiff, DEUSCHE BANK NATIONAL TRUST COMPANY, as Trustee for New Century Home Equity Loan Trust, Series 2005-C Asset, lacks standing to bring this Complaint for the following reasons:

- 1) DEUSCHE BANK NATIONAL TRUST COMPANY is not registered with the Texas Secretary of State, as either a Texas or a foreign corporation.
- 2) DEUSCHE BANK NATIONAL TRUST COMPANY is not registered with the Texas Banking Commission as a Trust Company.
- 3) DEUSCHE BANK NATIONAL TRUST COMPANY is not registered with the United States of America Office of the Comptroller of the Currency.

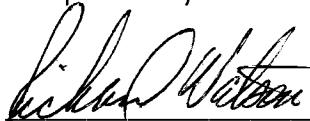
DEUSCHE BANK NATIONAL TRUST COMPANY has failed/refused to answer an Qualified Written Request sent by Richard and Cynthia Watson, pursuant to 12 USC 2605(e).

DEUSCHE BANK NATIONAL TRUST COMPANY has not performed all conditions precedent for this Case.

Richard and Cynthia Watson hereby challenge the attorneys to prove they are lawfully representing the said Plaintiff in this Case.

THEREFORE, Richard and Cynthia Watson hereby Request this Court to dismiss this Case with prejudice.

Respectfully



Richard Watson

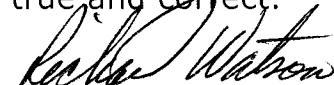


Cynthia Watson  
23844 Tres Coronas Road  
Spicewood, Texas 78669

(512) 431-1181

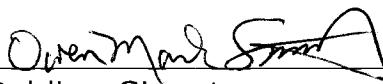
VERIFICATION

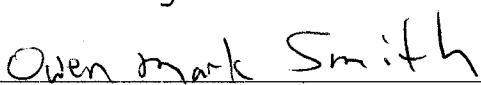
BEFORE ME THE UNDERSIGNED NOTARY PUBLIC, on this day, personally appeared Richard Watson, a man known to me. After I administered an oath to him, upon his oath, he said he read the above DEFENDANTS ORIGINAL ANSWER and that the facts stated therein are within his personal knowledge and are true and correct.

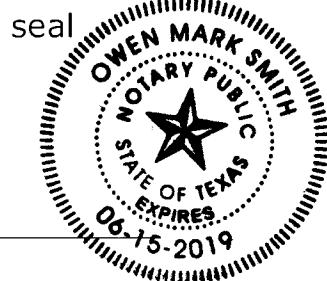


Richard Watson

SUBSCRIBED AND SWORN TO, before me the undersigned Texas Notary Public, on the 21 day of October, 2015.

  
\_\_\_\_\_  
Notary Public - Signature

  
\_\_\_\_\_  
Notary Public - Printed Name  
My Commission Expires on: 6/15/2019



## VERIFICATION

BEFORE ME THE UNDERSIGNED NOTARY PUBLIC, on this day, personally appeared Cynthia Watson, a woman known to me. After I administered an oath to her, upon her oath, she said she read the above DEFENDANTS ORIGINAL ANSWER and that the facts stated therein are within her personal knowledge and are true and correct.

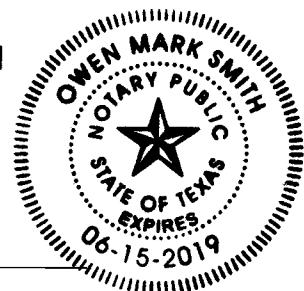
Cynthia Watson  
Cynthia Watson

SUBSCRIBED AND SWORN TO, before me the undersigned Texas Notary Public, on the 21 day of October, 2015.

Owen Mark Smith  
Notary Public - Signature

Owen Mark Smith  
Notary Public - Printed Name  
My Commission Expires on: 6-15-2019

seal



## CERTIFICATE OF SERVICE

I, Richard Watson, hereby certify I placed a copy of this DEFENDANTS ORIGINAL ANSWER in the U.S. Mail, handdelivered, or sent by facsimile, on the 21 day of October, 2015, addressed:

Mark D. Cronenwett  
14160 North Dallas Parkway, Suite 900  
Dallas, Texas 75254

Richard Watson  
Richard Watson